

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK** X**SUSAN LASK,**

Plaintiff,

- vs -

**MARGARET RHEE-KARN and  
DOUGLAS R. DOLLINGER, ESQ.,  
Defendants.****SUMMONS WITH NOTICE**

Index No.:

Date Index No. Purchased  
February 2, 2024**Jury Trial Demanded**

To the Person(s) Named as Defendant(s) Above:

**PLEASE TAKE NOTICE** THAT YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the Plaintiffs at the address set forth below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the summons is not delivered personally to you within the State of New York.

**YOU ARE HEREBY NOTIFIED THAT** should you fail to answer or appear, a judgment will be entered against you by default for the relief demanded below.

Dated: February 2, 2024 LAW OFFICES OF  
SUSAN CHANA LASK/s/ Susan Chana Lask  
Susan Chana Lask, Esq.  
244 Fifth Avenue, Suite 2369  
New York, NY 10001  
(917) 300-1958LAW OFFICES OF  
ALEXANDER M. DUDELSON/s/ Alexander M. Dudelson  
Alexander M. Dudelson, Esq.  
26 Court Street - Suite 2306  
Brooklyn, New York 11242  
(718) 855-5100*Attorneys for Plaintiff*

Defendant's Address:

**-MARGARET RHEE-KARN**

402 E 90th St Apt 4E New York, NY 10128-5136

and 408 E 92<sup>nd</sup> St Apt 22B New York, NY 10128-6838 Tel. (917) 373-3923

Email:

**-DOUGLAS R. DOLLINGER, ESQ.**

570 County Route 49, Middletown, NY 10940-6883 and

1 Schindler Ct Apt 6, Middletown, NY 10940-2003 Tel. (845) 741-9363

Email: drdlinxs@aol.com

**Notice:** The nature of this action is in regards to Defendants years of harassment and stalking of Plaintiff and her clients and interfering with her business to satisfy their malicious intent to harm her personally and professionally as they both have a history of this misconduct to her and

others, including their intent to intimidate and extort her to pay Defendants money she does not owe them to settle a case they filed called Rhee-Karn v Lask in SDNY. After a January 24, 2023 federal court conference where Plaintiff informed the court that Defendants were stalking and harassing her and her clients, Defendants escalated their stalking and harassment by somehow finding the private cell number of her client Brian (redacted for confidentiality) who is a litigant in a confidential matrimonial case under DRL §235 and Defendant Rhee-Karn sent him a frightening and completely false text at 10:15 PM on February 6, 2023, from her cell phone of 917-373-3923, without identifying herself, about Plaintiff, as follows:

"Hi - I don't know if this is the right Brian (redacted), you don't know me, but if so, I'm sending you this message for someone who wants to relay important information as it relates to the attorney that you retained. You do not know what you are about to embark on, but you can be the next victim. Please know she is being sued for malpractice by 3 people currently. She is not what she appears and she will destroy your case and deplete you financially. All of this information is public, so just be aware. She needs to be stopped."

On February 7, 2023, Defendant Dollinger filed a letter on the public docket in the SDNY case continuing the libel by stating Rhee-Karn's statements "are true," when they are completely false. On March 2, 2023, the Magistrate in the SDNY case had Rhee-Karn appear personally, admonished her for attacking Plaintiff and her client with her malicious text and informed that a libel and interference with contractual relations case may be appropriate against Defendants. Additionally, during the SDNY case, for years, and particularly since August 2022 to December, 2023, Defendant Dollinger repeatedly filed documents and made oral statements to the SDNY court that were deliberate misrepresentations and intentionally false, all done with the complicit direction of Rhee-Karn, including denying District Court and Circuit Court rulings regarding federal sanctions against Dollinger, upheld by the Circuit Court, for filing similar false complaints against other parties, misrepresenting that he was appearing in the SDNY case with misrepresentations of an estate action against Plaintiff, misrepresentations regarding an August, 2022 federal order limiting his actions to certain dates, misrepresentations about discovery to halt a scheduled trial the night before it was to start as he numerous times before interfered with, including his false threats again of an estate case against Plaintiff and lying to the court that he had experts and witnesses who did not exist to prove his accusations, misrepresentations to the court about trial dates, motion dates and orders and his misrepresentations in September-October, 2023 that Plaintiff contacted his clients in a completely unrelated case whom she never contacted, among other numerous deliberate misrepresentations that were fraud on the court and warrant Judiciary 487 relief.

#### **Causes of action:**

- (1) Libel per se as Defendants each made a written defamatory statement concerning Plaintiff, negligently and maliciously published it to a third party, including her client and online, that was false to injure her in her trade or business and did so damage Plaintiff and per se damages are available;
- (2) Intentional interference with prospective economic relations as Defendants had knowledge of Plaintiff's client and targeted her client to harm their relations and did so damage Plaintiff;

(3) Judiciary Law §487 for Defendants numerous intentional deceits before the court during the pending proceeding, including false affirmations by them as counsel, all being egregious conduct or chronic and extreme pattern of behavior that caused Plaintiffs damages, including years of delaying a case then withdrawing on the day of trial, all proximately causing Plaintiff damages of legal fees to defend against Defendant's frauds and other damages;

(4) Aiding and Abetting and Civil Conspiracy to commit libel, fraud on the court and interference with prospective economic relations by Defendants who conspired with each other to do these illegal acts;

Plaintiff reserves the right to amend the complaint with additional causes of action.

**Relief sought:** Plaintiff seeks damages of \$1.1 Million Dollars, plus interest, costs and attorney fees, and declaratory and injunctive relief against Defendants from spreading their lies and an Order that Defendants retract any and all defamatory statements; pay compensatory damages in an amount to be determined at trial; pay punitive damages in an amount to be determined at trial; and awarding pre- and post-judgment interest, costs and such other and further relief as this Court may deem just and proper.

Should Defendants fail to appear herein, judgment will be entered by default for the sum of One Million One Hundred Thousand Dollars, with interest from the date of February 4, 2023, and costs of this action.

**Venue:** Plaintiff designates New York County as the place of trial because Defendant Rhee-Karn resides in New York County and all of the events occurred there.





# **NYSCEF Confirmation Notice**

## **New York County Supreme Court**



The NYSCEF website has received an electronic filing on 02/02/2024 03:43 PM. Please keep this notice as a confirmation of this filing.

**151005/2024**

**Susan Lask v. Margaret Rhee-Karn et al**  
**Assigned Judge: None Recorded**

### **Documents Received on 02/02/2024 03:43 PM**

| <b>Doc #</b> | <b>Document Type</b> |
|--------------|----------------------|
| 1            | SUMMONS WITH NOTICE  |

### **Filing User**

Susan Chana Lask | scl@appellate-brief.com  
244 5th Ave Ste 2369, New York, NY 10001

### **E-mail Service Notifications**

An email regarding this filing has been sent to the following on 02/02/2024 03:43 PM:

**SUSAN C. LASK - scl@appellate-brief.com**

### **Email Notifications NOT Sent**

| <b>Role</b> | <b>Party</b>        | <b>Attorney</b>       |
|-------------|---------------------|-----------------------|
| Respondent  | Margaret Rhee-Karn  | No consent on record. |
| Respondent  | Douglas R Dollinger | No consent on record. |

\* Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent.

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**Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court**

Phone: 646-386-5956 Website: [http://www.nycourts.gov/courts/1jd/supctmanh/county\\_clerk\\_operations.shtml](http://www.nycourts.gov/courts/1jd/supctmanh/county_clerk_operations.shtml)

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**NYSCEF Resource Center, [nyscef@nycourts.gov](mailto:nyscef@nycourts.gov)**

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